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E-FILED: November 30, 2021

**UNITED STATES BANKRUPTCY COURT**

**DISTRICT OF NEVADA**

**In Re:** ) Case No. BKS-21-13343-nmc  
Cynthia L. Garcia, ) Chapter 13  
                        )  
                        ) Hearing Date: December 29, 2021  
                        ) Hearing Time: 1:30 PM  
                        )  
                        )  
**Debtor(s).**      )  
                        )  
                        )

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**DEBTOR'S OPPOSITION TO MOTION FOR**  
**RELIEF FROM AUTOMATIC STAY**

COMES NOW, Cynthia L. Garcia, by and through attorney, George Haines, Esq.,  
FREEDOM LAW FIRM, LLC, and in response to **Carvana (creditor)**, Motion for  
Relief from Automatic Stay states as follows:

1. On June 30, 2021, Debtor filed the current Chapter 13 Petition in  
Bankruptcy with the Court.
2. On or about November 23, 2021, Creditor filed a Motion for Relief from  
the Automatic Stay with respect to property: 2017 Ford Focus, stating the client is  
\$862.00 in arrears.

WHEREFORE, debtor requests:

**Carvana's** Motion be continued for a sufficient amount of time to permit debtor to have a plan filed to resolve the matters stated above.

1. Such other relief as the Court finds appropriate.

Dated: November 30, 2021

/s/George Haines, Esq.  
George Haines, Esq.  
**Attorney for Debtor(s)**